R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com

November 7, 2002

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-314 – Application of Qwest Communications International Inc. for Authorization to Provide In-Region, InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing in response to questions raised by Commission staff in connection with loop qualification issues.

MLT vs. RLDT Information

Commission staff has asked Qwest to identify the information a Mechanized Loop Test ("MLT") provides that is not provided in the Raw Loop Data Tool ("RLDT"). Commission staff asked Qwest to cover the following in its response:

- Line resistance;
- Balance between the tip and the ring;
- Ground conditions on either end;
- Foreign voltage;
- Electrical characteristics;
- Whether the line is capable of supporting ADSL;
- Whether there are opens on the line in the outside plant;

- If there is a digital loop carrier all the way to the customer drop;
- Whether the RT cards at the customer premise are bad;
- Whether there are bad DSL facility utilizing UDC;
- Whether the line record accurately reflects the service currently on the line;
- Whether there is poor longitudinal and capacitive balance;
- Whether there is a summary of faults on a line with multiple faults; and
- Whether the line is out of service for purposes of DSL service.

The difference between the information provided in the MLT and RLDT is described more fully below. At the outset, however, it is worth noting that the MLT is not used by Qwest as a pre-order qualification tool. Rather, it is a diagnostic test performed primarily in a post-order/repair environment to determine the functionality of a loop. For example, the QCCC uses MLT to ensure Qwest is turning over a quality circuit when converting a loop from Qwest to a CLEC as part of the provisioning process. *The MLT functionality is not a test that Qwest performs to determine if a loop can qualify for Qwest DSL service as part of the pre-order process.* Qwest has provided in earlier FCC filings details regarding the circumstances in which the MALT process is used to determine MLT distance. As previously described, Qwest updates this MLT distance information in the LQDB database, the same database used for both Qwest Retail and Wholesale loop qualification queries.

The Commission consistently has treated loop qualification as a pre-order function. "Loop qualification information identifies the physical attributes of the loop plant . . . that enable carriers to determine whether the loop is capable of supporting xDSL and other advanced services." *UNE Remand Order* at 426. Loop qualification information is provided so the CLEC can, on a pre-order basis, make an "independent judgment about whether the loop is capable of supporting the advanced services equipment the requesting carrier intends to install." *Id.* at 427. BOCs such as Qwest must provide this information as a "pre-ordering function." *Id.* at 426. The Commission reiterated this point recently in its decision to extend Section 271 authority to BellSouth for seven states:

> In accordance with the *UNE Remand Order*, the Commission requires incumbent carriers to provide competitors with access to all of the same detailed information about the loop that is available to the

> incumbents, and in the same time frame, so that a competing carrier can make an independent judgment *at the pre-ordering stage* about whether an end user loop is capable of supporting the advanced services equipment the competing carrier intends to install. (emphasis added) (footnotes 106-107 omitted). [1]

In a footnote appended to this statement (footnote 108), the Commission went on to state that "because characteristics of a loop, such as its length and the presence of various impediments to digital transmission, can hinder certain advanced technologies, carriers often seek to *'pre-qualify'* a loop . . ." (emphasis added).

It should be noted that Covad acknowledged in the Minnesota Section 271 state proceeding that Qwest's RLDT provides all the categories of loop qualification information that Covad needs to qualify a loop for DSL service.[2] Also important is that Qwest's MLT capabilities are not as advanced as those of other RBOCs. Qwest is currently using the MLT LoopCare generic of MLT G10I14.7 (also referred to as LoopCare LC 1.0). All other RBOCs are using LC 2.0 which allows for possible DSL-specific testing (load coils, bridged taps, wideband noise) if new generation test equipment is also installed.

In response to staff's specific question, the table below demonstrates that a majority of the fourteen measures identified in this question are not required for pre-order loop qualification and therefore are not provided in Qwest's RLDT.[3] Nevertheless, these measures can be used to

---

[1] Alabama/Kentucky/Mississippi/North Carolina/South Carolina 271 Order at Appendix H, ¶ 35.

[2] Covad testified that "[i]t is not Covad's position that Qwest does not provide the categories of information it requires in order to determine whether it can offer xDSL services." Minnesota 10/8/02 Transcript at 78-79. In response to a Qwest Motion to Compel, Covad stated: "Covad has never invoked technical differences between its DSL products and that offered by any other entity to suggest that the [Raw Loop Data Tool] should provide different or additional types or categories of information. Covad has never stated in any testimony or brief that the categories of information provided by the [Raw Loop Data Tool] are insufficient for it to determine whether a loop meets Covad's technical needs." Qwest I Reply Exhibit LN-2 (Covad Response to Qwest Motion to Compel Responses, MPUC Docket No. P-421/CI-01-1371, July 24, 2002).

[3] As defined by ANSI T1.413 and T1.417and by NRIC V FG3. These industry standards indicate the information necessary to qualify a loop for DSL service.

assure quality in both provisioning and repair, which is why Qwest performs an MLT at those stages. Two of the fourteen measures identified in this question (whether the line is capable of supporting ADSL and whether there is a digital loop carrier all the way to the customer drop) are in fact needed to qualify a loop for DSL service; but, as noted in the chart below, they already are provided in the RLDT.

	Required for Pre-Order Loop Qualification [a]	Provided in standard MLT	Provided in Qwest's Raw Loop Data Tool
Line Resistance	No	No[b]	No
Balance between the tip and the ring	No[c]	Yes	No
Ground conditions on either end	No[c]	Yes	No
Foreign voltage	No[c]	Yes	No
Electrical characteristics [d]	No[c]	Yes[d]	No
Whether the line is capable of supporting ADSL	Yes	No	Yes[e]
Whether there are opens on the line in the outside plant	No[c]	Yes	No
If there is a digital loop carrier all the way to the customer drop	Yes[f]	Yes[g]	Yes[h]
Whether the RT cards at the customer premise are bad	No[c]	Yes	No
Whether there are bad DSL facility utilizing UDC	No[c]	Yes	Yes[h]
Whether the current line record accurately reflects the service	No[c]	Yes[g]	No
Whether there is poor longitudinal and capacitive balance	No [c]	Yes	No
Whether there is a summary of faults on a line with multiple faults	No [c]	Yes	No
Whether the line is out of service for purposes of DSL service	No [c]	No	No

a) As defined by ANSI T1.413 and T1.417and by NRIC V FG3. These industry standards indicate the information necessary to qualify a loop for DSL service.

b) Line resistance is only returned with an LRM request. It is not returned by the standard MLT requests. (Standard MLT requests include FULLX, LOOPX, QUICKX and COX tests).

c) This would generally be considered maintenance and repair information, not loop characteristic information.

d) For the purpose of this response, Qwest considers "electrical characteristics" to mean the standard set of five diagnostic measurements Qwest may perform in the repair environment. A field tech determines four of these measurements using test equipment: loop current, circuit loss, metallic noise and power influence. The fifth measurement, longitudinal balance, can be measured by a field tech using test equipment or by an MLT.

e) A CLEC can use the data provided in the RLDT to determine if a loop is capable of supporting ADSL service. Also, the Unbundled ADSL portion of Qwest's IMA Loop Qualification Tool provides a "Yes"/"No" answer indicating whether a line is capable of supporting ADSL service.

f) Presence of DLC on a line is necessary in determining whether the line qualifies for DSL service.

g) This determination requires technical interpretation of the MLT test result.

h) The "Pair Gain Type" field of the Raw Loop Data Tool will indicate if DLC is present on the line, and if so, will identify the type of DLC (*e.g.*, UDC). This information is shown for each segment of the loop, so a CLEC can determine when and where DLC is present on the loop.

Generally, the information needed to qualify a line for xDSL service are the loop length, the presence and length of bridged tap, the presence of load coils, and the presence of DLC on the line. The RLDT provides all of this information.

As previously indicated, MLT is used primarily as a repair tool. The following descriptions explain how the measures identified in this question are used in the repair environment.

- Line resistance: Line or loop resistance is returned only with a Line Resistance Measurement ("LRM") request. Line resistance is not included within the standard MLT requests of FULLX, LOOPX, QUICKX or COX. LRM is used for calibration of MLT access ports or for detailed interactive troubleshooting with a field technician. The technician must place a short at the customer premise before an LRM request can be initiated.

- Balance between the tip and ring: Capacitive balance between tip and ring is normally displayed unless a fault condition prevents a measurement. If the loop measures below 98% capacitive balance then a repair is necessary.

- Ground conditions on either end: Ground faults in the loop may cause voice and signaling problems. Grounds lower than 1MΩ require that a repair be made.

- Foreign voltage: Foreign voltages (crossed battery) may cause voice and signaling problems. Voltages greater than 6vDC or 25vAC require that a repair be made.

- Electrical characteristics: For the purpose of this response, Qwest considers "electrical characteristics" to mean the standard set of five diagnostic measurements Qwest may perform in the repair environment. A field technician determines four of these measurements – loop current, circuit loss, metallic noise and power influence – using test equipment. The fifth measurement, longitudinal balance, can be measured by a field tech using test equipment or by an MLT. These measurements are used to determine if a line meets the generally accepted requirements for POTS service.

- Whether the line is capable of supporting ADSL: Qwest's version of MLT cannot return information that indicates whether a line is capable of supporting DSL service.

- Whether there are opens on the line in the outside plant: An open condition may be seen if standard ringers are not seen during testing; this is often seen when the line is connected to a computer, modem, FAX machine, etc. An open condition may require repair of the loop.

- Is there a digital loop carrier all the way to the customer drop: A fiber-in-the-loop DLC system can be recognized by the particular VER code returned (*e.g.*, VER9F=TOK). There are no specific non-failure VER codes that identify the presence of DLC.

- Whether the RT cards at the customer premise are bad: Bad UDC or DLC channel cards are indicated with particular VER codes (*i.e.*, VER57=BAD RT CHANNEL UNIT). This is often seen with a failure of the bank common cards or of the test access equipment. This VER code indicates the need for replacement of a DLC channel card.

- Whether there is a bad DSL facility utilizing UDC: This condition can be recognized by a specific VER code (*i.e.*, VER2R). This display is the result of a resistive signature returned by the UDC system itself and does not indicate DSL-specific tests were performed by MLT. This VER code indicates the need for a repair of the cable pair being used as a DSL facility for the UDC system.

- Whether the current line record accurately reflects the service currently on the line: MLT uses LMOS line records to determine the VER code to be returned by comparing the test results with those expected for the equipment found on the line record. The customer line record may be incorrect since there is no control over what CPE may be placed on the loop. This information can be helpful in determining the type of repair that may be required on the line.

- Whether there is poor longitudinal and capacitive balance: Poor longitudinal balance may indicate a noisy line. It should be repaired if less than 60dB and must be repaired if less than 40dB.

- Whether there is a summary of faults on a line with multiple faults: A VER99 result will include worded summary messages detailing the various troubles seen. The VER99 feature recently loaded has reduced the number of VER99s; they have been replaced by individual VER codes (*e.g.*, VER41 OPEN OUT & BALANCED). This information can be helpful in determining the type of repair that may be required.

- Whether the line is out of service for purposes of DSL service: MLT has no way of determining a line is out of service for DSL except for an ISDN line (VER49). MLT

receives this information with a query of the serving switch; MLT makes no direct measurements.

Loop Qualification Information Used by Qwest

Commission staff asked several questions regarding the loop qualification information used by Qwest. For purposes of clarity, we respond below to each question separately.

Does the Qwest DSL support team use RLDT?

In response to this question and the following questions, Qwest makes the assumption Commission staff is referencing the *Retail* Qwest DSL support team which would include the sales, marketing, product development, and DSL Center ("DSLC").

Qwest DSL is the Retail DSL product offered to Qwest retail customers. The Retail Qwest DSL team does not use the RLDT. The RLDT is a tool available to CLECs through the IMA OSS interface that allows CLECs to perform a query to obtain raw loop information. In other words, the RLDT provides the underlying information on the make up of the loop, such as the length and gauge of loop segments, the presence of bridged taps and load coils, and the presence and type of any digital loop carrier system. Using its own parameters for the type of DSL service it wishes to offer, a CLEC can use this raw loop information to determine if the requested loop meets the technical parameters of the DSL service the CLEC seeks to offer. The RLDT obtains its loop make up information from the Loop Qualification Database ("LQDB"), which is the database that also supports the Qwest DSL tool.

The Retail Qwest DSL team utilizes QCity/QServ, which extracts qualification data from the LQDB and uses that information to provide a "Red" or "Green" (yes/no) determination on whether a loop will support Qwest DSL service. The LQDB is the same data source used for Wholesale Loop Qualification responses. Unlike the RLDT, the QCity/QServ tool available to the Qwest retail service representative returns the "Red" or "Green" qualification response, but does not return the underlying loop make up information. CLECs wishing to qualify loops for Qwest DSL for Resale also utilize QServ through IMA to determine if the requested loop can support Qwest DSL for Resale. *See* Attachment A (Y-Diagram).

Do they use any other back office information systems?

QCity/QServ is the loop qualification tool utilized by the Retail Qwest DSL support team. It draws loop qualification information from the LQDB and determines if the loop qualifies for Qwest DSL based upon Qwest's specific algorithm for its own DSL service. Qwest Retail service representatives do not use any other back office information systems for loop qualification.

What information is used by Qwest DSL before provisioning the line to determine that it is capable carrying data traffic?

As discussed above, Qwest Retail service representatives use the QCity/QServ tool, which provides a "Red" or "Green" qualification response, to determine if a loop supports Qwest DSL service. The QCity/QServ tool obtains loop information from the LQDB.

The Qwest DSL support team does not perform any tests to ensure a line is capable of carrying data traffic before provisioning. The "Red/Green" query performed by the Retail customer service representative prior to submission of an order is the only inquiry regarding whether the line is capable of supporting Qwest DSL service.

What information is accessible to the Load Resource and Allocation Center?

The Load Resource and Allocation Center ("LRAC") is the network organization within Qwest that controls the daily load of field technicians that are available to work on repair tickets or service orders. The LRAC can read the information in LFACS but does not have the capability to update, modify or change the LFACS database. The LRAC does not perform pre-order loop qualification.

To expand on the LRAC's involvement in the DSL provisioning process, it is important to provide background on the role the LRAC plays. Should a field technician, when dispatched to provision or repair Qwest DSL service, determine that the customer's loop cannot provide DSL service, the technician is instructed to (1) notify the customer that the line does not qualify, and (2) advise the customer that the DSL service will be removed or cancelled. The LRAC is instructed to obtain specific information from the field technician, complete the Technician Feedback Website Form, and advise the DSL Center ("DSLC") to cancel the order for service or issue an order to remove the DSL service from the customer's record. Qwest Retail DSL service is only provisioned on qualified non-loaded copper loops. At this time, Qwest

does not remove load coils or bridged taps if present on a Retail customer's line.

Information provided on the Technician Feedback Website Form is evaluated by the Database Administration Group ("DAG"). The DAG is the same organization within Qwest that investigates manual loop make-up information requested by CLECs. Should changes be required to correct LFACS after investigation, the DAG coordinates with the Loop Provisioning Center ("LPC") to update the LFACS database.

Is this information different from the information provided in the RLDT?

No, the loop make-up information available to the LRAC through LFACS is the same loop make-up information that is available through the RLDT.

Do Qwest DSL (or Qwest DSL support team) personnel have direct access to LFACs?

Qwest DSL personnel (the Qwest DSL support team) does not have direct access to LFACS. The only Qwest employees who have direct access to LFACS are employees in the Information Technologies organization who provide technical support for LFACS and network engineers and technicians who are engaged in provisioning or maintenance and repair activities for both Qwest and CLECs.

RLDT Information and Back Office Information

Commission staff asked several questions regarding the information provided in the RLDT and in Qwest's back office. Once again, for purposes of clarity, we respond below to each question separately.

Does the RLDT contain unreliable loop make-up information?

The answer to this question is an emphatic "no." In fact, Qwest has made a concerted effort to ensure that the loop make-up information provided to CLECs through the LQT, the RLDT and the Wire Center RLDT is reliable and reflects the information that resides in LFACS.

Qwest has over the last two years, made enhancements to its loop qualification tools to provide more robust and comprehensive information, so

that requesting carriers can make an independent judgment about whether the loop is capable of supporting the advanced services the requesting carrier intends to install. Specifically, in August 2001 with IMA Release 8.0, Qwest added the following enhancements to the Raw Loop Data Tool:

- Loop make-up for non-published and non-listed telephone numbers.
- Loop make-up for telephone numbers associated with Centrex and PBX systems.
- Loop make-up information for spare facilities, including partially connected facilities (e.g., those connected from the crossbox to the customer drop).
- A "recent changes" check for updated loop make-up information in LFACS.[4]

In October 2001, Qwest added an auto-qualification functionality for CLECs in the Qwest DSL for Resale tool to periodically re-qualify a loop when a "not qualified" response is received. With IMA Release 9.0, Qwest

---

[4] Prior to the implementation of IMA Release 8.0 in August of 2001, changes to loop makeup returned in response to a Raw Loop Data ("RLD") query could take up to 30 days to be reflected in a pre-order query due to the refresh schedule for wire center updates. With the implementation of IMA Release 8.0 in August of 2001, an enhancement was added to the pre-order query capabilities of the RLD Tool. This enhancement was termed a "Recent Changes" check (referred to internally as the "Up2Date process") that allowed for the retrieval of the most current loop make-up information when a query was entered into the RLD tool by a CLEC on a particular loop. This Recent Changes check is the same process used for Qwest DSL and Qwest DSL for Resale, in which QServ performs an up-to-date query that refreshes the LQDB with new or recent change information that resides in the LFACS database. Certain pieces of data are being refreshed by LQDB when the recent changes query is invoked. The Recent Changes process refreshes the (1) terminal ID, (2) cable name, and (3) cable pair number when a real-time query is initiated, but not information for bridged tap removal, load coil removal, change in segment length or wire gauge. When this data is changed by order activity, it is not reflected in LQDB until that wire center is refreshed (all wire centers are refreshed within the 30-day period). However, because the same systems process is consistently utilized for both the RLD tool and the Qwest DSL tool, the same data is being provided regardless of whether the query is initiated from IMA or from Retail.

This monthly wire center refresh process does not impact the Unbundled ADSL tool query functionality, due to the fact that that particular IMA tool does not query QServ or LQDB, but rather queries the LFACS database through Facility Check. While Covad has presented arguments that the RLD tool is not accurate, Covad also has testified that it only utilizes the RLD tool for Line Shared loop orders. Line Shared loops are limited to ADSL or ADSL-like technology. Therefore, if Covad were utilizing the proper tool for Line Shared loop qualification, the Unbundled ADSL tool, it would receive updated information on loop conditioning.

deployed an enhanced version of the Loop Qualification Tools, using industry-based LSOG 5 guidelines, and combined the functionality of the Qwest DSL for Resale and the Unbundled ADSL Loop Qualification tool. Qwest further enhanced the RLDT in a production patch to IMA 9.0 in March 2002 to provide loop make-up on working unbundled loops assigned to CLECs. It is worth noting that Qwest's existing loop qualification tools provide information on more than 90% of Qwest's loops.

To be clear, the LQDB that supports the RLDT is the same database that supports the Qwest DSL qualification tool. Any purported inaccuracies in the LQDB that affect CLECs also affect Qwest's own DSL qualifications. The Commission on numerous occasions has rejected arguments that an RBOC is required to ensure the accuracy of the loop make-up information it provides. [5]

In addition to the loop qualification tools available to CLECs, Qwest also provides CLECs a mechanism to request a manual look-up of loop make-up data should the CLEC find that the response the tools return is incomplete or inconsistent, or if the CLEC questions the accuracy of the information returned. [6] Qwest commits to return the loop make up information in 48 hours. Although Qwest implemented this manual look-up process in June 2002, Qwest has received only five such requests to date (all from a single CLEC). If the loop qualification tools Qwest provides to CLECs were as unreliable as some CLECs claim, the level of manual requests would certainly be much higher. To further assure CLECs that Qwest provides the same quality loop qualification information to them as it provides to itself, Qwest has agreed to an audit of its loop qualification databases should a CLEC feel the need to validate that the information being returned by the tools is comparable to the information available to Qwest. Qwest has not received any such audit request to date. [7]

Qwest suspects – based on observation in several hearings and the workshop process – that a number of factors may be contributing to some CLECs' misperception that Qwest's existing loop qualification tools are "unreliable." For example, Covad has asserted that the RLDT is "unreliable"

---

[5] See, e.g., Alabama/Kentucky/Mississippi/North Carolina/South Carolina 271 Order at ¶ 142 (citing UNE Remand Order, 15 FCC Rcd at 3886 (¶ 429)).

[6] See SGAT § 9.2.2.8.6.

[7] See *id.* §§ 9.2.2.8 and 18.

based on a trial conducted in Colorado nearly two years ago. As previously stated, Qwest has made several modifications to its loop qualification tools to address the issues Covad raised. Qwest also believes that some of the purported inaccuracies Covad claimed it experienced with the RLDT were the result of Covad misinterpreting the information the tools return. Qwest's analysis of Covad's concerns regarding Colorado xDSL Trial and the reliability of the tools can be found in the ROC I OSS Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty at paragraphs 57-64, ROC II OSS Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty at paragraphs 63 –77 and the ROC R OSS Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty at paragraphs 21-27.

Qwest has learned that in certain situations CLECs are not even performing loop qualifications prior to submitting their orders. For example, Covad has acknowledged to Qwest that it does not use the loop qualification tools prior to submitting an order because Qwest does not require CLECs to perform a qualification prior to submitting an LSR. Instead of attempting to qualify loops prior to submitting them, Covad relies on Qwest's 11-step provisioning process to attempt to find a loop to fulfill its request.

Please provide evidence that all information available to Qwest representatives is the information available in the RLDT.

To respond to this question, Qwest will assume that the term "Qwest representatives" refers to Qwest's *Retail* service representatives. These Retail representatives have access only to Qwest's QCity/QServ tool for loop qualification and do not have access to the IMA or web-based RLDTs.

Comprehensive evidence already has been provided to the Commission and can be found in KPMG's OSS *Final Report*, Test 12.7. As part of this parity test, KPMG performed an independent assessment of the tools, processes and procedures provided by Qwest to its Retail service representatives with that provided to CLECs via the Wholesale tools. During the test, KPMG visited both Qwest's Retail service centers and Wholesale service centers, performed real-time on-site observations of the tools and the data provided by the tools, analyzed the system architecture information to ensure parity and scrutinized Qwest documentation, including the Raw Loop Data & Loop Qualification CLEC Job Aid, for accuracy. KPMG found conclusively in Test 12.7 that Qwest does indeed provide parity of information to CLECs with that available to Qwest's Retail representatives. KPMG also determined that the data source for wholesale loop qualification information is the same data source that Qwest Retail uses for loop qualification, the LQDB.

Because both Wholesale and Retail use the same database, *i.e.*, parity by design, Qwest can ensure that that any information available to Qwest Retail representatives is also made available to CLECs. For further information and associated diagram please refer to the ROC-R OSS Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty at paragraphs 28 and 30.

Do CLECs have access to all Qwest back office systems?

With respect to loop qualification, CLECs do indeed have mediated access to all the back office systems and data necessary to determine if a loop will qualify for the DSL service they seek to provide. The RLDT, the web-based Wire Center RLDT, and the Qwest DSL for Resale portion of the IMA LQT all are supported by Qwest's LQDB. These pre-order tools provide access to the applicable back office systems needed to respond to the specific pre-order loop qualification query. The LQDB uses LFACS as its source. The Unbundled ADSL portion of the IMA Loop Qualification Tool accesses Facility Check which interfaces with LFACS to obtain loop qualification information. Depending on the type of xDSL service a CLEC is seeking to provide, the CLEC can access the appropriate loop qualification tool to determine, on a *pre-order* basis, the characteristics of a loop. For the Qwest DSL for Resale product, the IMA tool provides the CLEC a qualification response.

In addition to these real-time tools, CLECs also may request that Qwest conduct a manual search of its back office systems and databases for loop make up information. In the event the CLEC encounters a response from the tools that is incomplete or inconsistent or if the CLEC questions the accuracy of the information returned, Qwest will conduct a search of its back office systems and databases on behalf of the CLEC. Qwest commits to respond to such a manual request within 48 hours. This manual process is described in the ROC I OSS Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty at paragraphs 69-75; the ROC II OSS Direct Declaration of Lynn M. V. Notarianni and Christie L. Doherty at paragraphs 116-117; and the ROC II OSS Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty at paragraphs 84-87.

Activity in the QCCC

Commission staff has asked whether the QCCC performs an MLT only on hot cuts or on other loops ordered by CLECs.

Qwest's QCCC performs an MLT when provisioning any analog loop converting from Qwest dial tone (from Qwest Retail or CLEC Resale) to a CLEC unbundled loop for both basic and coordinated installations.

***

The 20-page limits does not apply to this filing.

Respectfully submitted,

Hanee Haney

cc: E. Yockus
M. Carowitz
G. Remondino
J. Myles
R. Harsch
J. Jewell
P. Baker
C. Post
P. Fahn
B. Smith
J. Stanley
C. Washburn
S. Vick
S. Oxley
J. Orchard